



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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August 7, 2018

**BY ECF**

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Martinez v. City of New York, et al., No. 1:16-cv-00079-AMD-CLP

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. The parties write jointly to respectfully request a one week extension of time, from August 7, 2018 to August 14, 2018, to file supplemental letters regarding depositions. The parties apologize for the belated nature of this request.

As ordered by the Court, the parties have spent considerable time, particularly over the last two days, trying to work together to narrow the scope of their dispute. To that end, the parties have made progress towards not only narrowing the scope of their dispute concerning depositions, but also towards narrowing the number of claims and defendants. However, the parties require additional time to both assess their positions and continue their discussions. Accordingly, the parties respectfully request a one week extension of time, from August 7, 2018 to August 14, 2018, to file supplemental letters regarding depositions, with the hope that the parties may reach a resolution, or at the very least significantly narrow the dispute.

Thank you for your consideration of this request.

Respectfully,

/s/ **Kavin Thadani**

Kavin Thadani  
Senior Counsel  
Special Federal Litigation Division

cc: **BY ECF**  
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